



November 13, 2020

VIA ECF

Hon. Katharine S. Hayden, U.S.D.J.
Hon. Cathy L. Waldor, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
Newark, NJ 07102

Re: *NXIVM Corp., et al. v. Ross Institute, et al.*, Civil No. 06-1051

Dear Judges Hayden and Waldor:

I represent Rick Ross. Pursuant to my earlier request, by Text Order [DE 851] dated September 20, 2019, *"The Court grants the request (DE 850) to authorize the filing of the Keith Raniere deposition in accordance with the terms of Paragraph 9 of the March 2007 Discovery Confidentiality Order (DE81). So Ordered by Magistrate Judge Cathy L. Waldor on 9/20/19. (tjg,) (Entered: 09/20/2019)."*

As I am sure you are aware, Mr. Raniere was recently sentenced to 120 years in prison following his conviction in the EDNY. The NXIVM saga has attracted great international interest and media coverage. I have been asked to provide copies of the videos of Mr. Raniere's depositions, which are not addressed in the Court's September 2019 Order.

I respectfully request a further Order authorizing the release of the videotaped depositions of Mr. Raniere, Nancy Salzman and Clare Bronfman. Mr. Raniere and Ms. Bronfman have both been convicted and sentenced; Ms. Salzman has pleaded guilty, for crimes including tampering with evidence in the case before this Court.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "Peter L. Skolnik", written over the typed name and address.

Peter L. Skolnik
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Attorney for Rick Ross and the Ross Institute

cc: All counsel via ECF